

Committee on Resources

Subcommittee on National Parks & Public Lands

Witness Statement

Subcommittee on National Parks and Public Lands.
Oversight hearing on Snowmobile Recreation in National Parks, particularly
Yellowstone National Park.

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Washington DC
Testimony of
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To conserve the scenery and the historic objects and the wildlife therein, and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 USC. Sec 1)

Chairman, and members of the subcommittee on National Parks and Public Lands. Thank you for the opportunity to testify before this committee regarding the National Park Service's recent decision to protect most of the National Park System from motorized thrill-craft such as snowmobiles.

My name is Sean Smith and I am the public lands director for Bluewater Network, a national environmental organization protecting public waters, lands, and ecosystems. Bluewater Network and the more than one million people we represent support the National Park Service's recent decision to phase-out recreational snowmobiling. For the following four reasons:

1. Snowmobiles damage the parks.

Snowmobiles are multiple impact machines, which inflict damage to air and water quality, visitor enjoyment, public safety, wildlife, and natural quiet. Numerous studies and research have confirmed this damage. For example:

- *Snowmobiles Damage Air and Water Quality*

Recent tests conducted by the SouthWest Research Institute confirm that the two-stroke engines of snowmobiles emit hundreds of times more pollution than a modern automobile. The exhaust compounds emitted by two-stroke engines contain pollutants such as polycyclic aromatic hydrocarbons (PAH), which are known to be highly toxic to plants and wildlife, even at minute levels. Nitrogen Oxides (NOx) and hydrocarbon (HC) emissions from snowmobile two-cycle engines are also a major concern due to their contribution to ground level ozone. Ground level ozone is formed when HC and oxides of Nitrogen react in the presence of sunlight. Beside adverse human health impacts, ground level ozone is known to adversely affect the environment by reducing tree seedling growth, increasing plant's susceptibility to pests, and

reducing visibility.

- *Snowmobiles Destroy Natural Quiet*

At Yellowstone National Park, recent test found that at many major park attractions snowmobile noise could be heard a vast majority of the time. At Old Faithful, the icon symbol of the National Park System, it was found that snowmobile noise was audible 100 percent of the time. Snowmobile noise not only disturb visitors it can also impact wildlife by disrupting behaviors such as foraging. Since snowmobiles noise travels great distances, in some cases miles, it also has the ability to disrupt the experience of visitors engaged in more contemplative forms of recreation such as cross-country skiing.

- *Snowmobiles Injure Wildlife*

Snowmobiles advocates often state that snowmobiles inflict no harm on wildlife. However, wildlife biologists are discovering otherwise. For example, a four-year study at Voyageurs National Park found that snowmobiles were adversely impacting endangered gray wolves through displacement and disturbance. Other studies find that snowmobiles push wildlife such as Moose out of preferred habitat.

- *Snowmobiles Threaten Public Safety*

Along with protecting natural resources, Park Service management policies require the agency to prohibit activities, which expose the public, including the participants to unacceptable levels of danger. Snowmobiles are involved in a large number of accidents, which require greater medical attention than accidents involving similar vehicles. According to the Consumer Product Safety Commission (CPSC), on average more than 13,000 people are treated in US hospital emergency rooms for snowmobile related injuries every year. Over the last six winters nearly 600 people have been killed in the upper mid-west. Last winter, 38 people were killed in Wisconsin alone. The CPSC estimates that 10% of all people treated for snowmobile related injuries require continued hospitalization. This is double the average hospitalization rate for injuries suffered while using other consumer products such as all-terrain vehicles. Furthermore, a study in Alaska found that on a per mile comparison people who snowmobile are almost nine times more likely to suffer death or injury in accidents than automobile drivers.

- *Snowmobile Diminish Other Visitor Enjoyment*

Snowmobiles also disproportionately impact the enjoyment of other park visitors. For example, in 1994, the hotel concessionaire at Yellowstone solicited the comments of former guests on how the hotel could improve the stay of future visitors. By better than a two to one margin, respondents said that the best way to improve their visit was to ban snowmobiles.

For additional information on the damage snowmobiles cause the environment and wildlife please see Bluewater Network's snowmobile position paper at: www.bluewaternet.org.

2. The Law Requires it.

The vast majority of America's public lands are managed under a multiple-use doctrine. In contrast, however, Congress has set aside a small portion of the US landscape - roughly 5 percent - for special protection within the National Park System. These areas were selected because they contain unique, nationally significant, ecologically sensitive and/or irreplaceable resources such as the Grand Canyon and

Yellowstone's Old Faithful Geyser.

From the time the first parks were established, the public as well as Congress recognized that some activities, which might be appropriate on other federal lands, would permanently damage the resources and values for which the parks were established. Therefore, in 1916 Congress passed the Organic Act which states that the National Parks were established to provide public enjoyment and that appropriate forms of enjoyment for the National Park System are those activities that leave park resources "unimpaired for future generations."

The Organic Act, as well as several subsequent acts, not only exempts the Park Service from the multiple-use mandate, they clearly instruct the NPS to forbid forms of recreation that can cause lasting damage to park resources.

3. Gateway Communities May Actually Benefit

There has been some concern that a ban on snowmobiles will decrease park visitation and therefore destroy gateway economies. However, the Mayor of West Yellowstone recently stated that because the draw of the park is so large that even if snowmobiles are banned visitors would still come. In fact, an increasing number of people in the communities that border national parks are recognizing that the long term economic health of their community is dependent upon the protection of the park's resources and wildlife. This growing awareness has led a number of residents and resort operators to believe that a snowmobile phase-out will improve economic vitality since it is likely to result in the diversification of their winter recreation economy.

Finally, it is interesting to note that similar fears were raised during the implementation of other highly controversial National Park Service actions such as its management of the 1988 Yellowstone fires and the reintroduction of the endangered gray wolf. In both of these cases the fears of decreased visitation and economic devastation have not materialized.

4. It's the Right Thing to Do!

The National Parks are our country's national heritage. The National Park System contains and protects some of America's most sacred ideas, hopes and places. We should not forget that our ancestors put aside their short term wants and desires so that we could enjoy the park system we have today. Bluewater Network strongly believes that we should follow their example and err on the side of caution when considering the future of recreational activities such as snowmobiling. Future generations are certain to thank us for our foresight.

Petition to Prohibit Snowmobiling and Road Grooming in National Parks

Submitted to:

National Park Service

Submitted by:

Bluewater Network

Supported by:

Alaska Public Campaigns, American Canoe Association, American Land Conservancy, American Lands, Animal Welfare Institute, Aspen Wilderness Workshop, Association Working Against Keweenaw Exploitation, Audubon Council of Texas, Biodiversity Legal Foundation, Bluewater Network, California Native Plant Society, Campaign to Safeguard America's Waters, Colorado Environmental Coalition, Colorado Wild, Inc., Earth Island Institute, Environmental Defense Center, Environmental Media Services, Florida Biodiversity Project, Friends of the Earth, The Fund for Animals, Global Service Corps, Greenpeace Foundation, GREEN, Hells Canyon Preservation Council, High Sierra Hikers Association, Houston Audubon Society, Hudson River Sloop Clearwater, Humane Society for Columbia, International Marine Mammal Protection Project, Kentucky Citizens Accountability Project, Keweenaw Bioregion Chapter of the Alliance for Democracy, Klamath Siskiyou Wildlands Center, Lake Superior Greens, Massachusetts Audubon Society, Minnesotans for Responsible Recreation, Mono County Mining Committee, Natural Resources Defense Council, New Jersey Audubon, New Jersey Conservation Foundation, New Jersey Environmental Lobby, Noise Pollution Clearinghouse, Planning and Conservation League, Public Media Center, Ocean Advocates, Quite Use Coalition, Restore the North Woods, Safer Waters in Massachusetts, Salmon Protection and Watershed Network, Schubert & Associates, South Carolina Association for Marine Mammal Protection, Sky Island Alliance, Southwest Center for Biological Diversity, Southwest Montana Wildlands, South Yuba River Citizens League, Tides Foundation, Turtle Island Restoration Network, Wildlands Center for Preventing Roads, Wildlife Alive, Wild Utah Forest Campaign, Wilderness Society, Wild Wilderness.

Date Submitted:

January 21, 1999

EXECUTIVE SUMMARY

In 1916, the National Park Service (Park Service) was created by Congress to "conserve the scenery and the natural and historic objects and the wild life [of National Parks] and to provide for the enjoyment of the same [so as to] leave them unimpaired for the enjoyment of future generations." To achieve this objective, Congress has repeatedly reaffirmed its intention that, while National Parks should be available for appropriate public use, they must be protected from despoliation in order to preserve "nature as it exists." This preservation mandate is reflected in Park Service regulations and policies, both of which prohibit activities that: disturb wildlife; damage park resources; are not consistent with Park-specific enabling legislation; cause unacceptable impacts to visitor enjoyment, park resources, or natural processes; degrade air quality; produce unnatural or excessive noise; or pose a safety threat to Park visitors or participants. These standards exist to ensure that the magnificent beauty of National Parks is preserved for future generations to enjoy.

Since its creation, the Park Service has grown to include parks, recreation areas, lakeshores, monuments, parkways, trails, memorials, historic sites, and scenic rivers. While not all park units can meet the grandeur of Yellowstone, the splendor of Yosemite, or inspire us like the Grand Canyon, each National Park protects areas of significant ecological, aesthetic, scientific, and historical importance. Collectively, the National Park system provides areas of beauty and naturalness for contemplation, education, and recreation. Indeed, millions of people from around the world visit our National Parks each year. This has led to increased concern over the impact of human use and recreation on the parks' ecological and cultural resources. We are literally loving our parks to death.

While no type of recreational activity has entirely benign impacts, certain activities result in far more significant short and long term ecological and social impacts than others. Snowmobiling, which is permitted in 36 National Park units, including National Parks in Alaska, is one of the most environmentally

devastating recreational activities permitted by the Park Service. It is estimated that over 180,000 snowmobiles enter our National Parks each year resulting in adverse impacts to Park wildlife, air and water quality, vegetation, Park ecology, and Park users.

Wildlife, including small and large mammals, birds, and threatened and endangered species, are seriously affected by snowmobile recreation. The scientific literature paints a disturbing picture of the impacts which snowmobiles can have on wildlife. The chasing and harassment of wildlife by snowmobilers can lead to animal exhaustion and death. The disturbance of wildlife by snowmobiles can alter animal distribution and movement patterns, displace animals from important habitat or nest sites, disrupt predator/prey interactions, fragment habitat, increase stress, alter the critical energy balance of wildlife during winter, and disrupt population dynamics. These impacts can affect the viability, productivity, and survival of a large number of species including wolves, bison, grizzly bears, deer, elk, moose, coyotes, foxes, and even small mammals who survive the winter under the snow.

Groomed roads, which some parks create to facilitate snowmobile use, can result in even greater impacts to Park wildlife and ecology. Indeed, according to Dr. Mary Meagher, the world's foremost expert on Yellowstone bison, bison use of the groomed snowmobile roads in Yellowstone "was the largest factor in contributing to population increase, major distributional changes, and ultimately habitat impacts." These trails also facilitate bison emigration from the Park where over 3,000 Yellowstone bison have been killed since 1985 by the State of Montana.

Snowmobiles are highly polluting machines, emitting dangerous chemicals such as nitrogen oxides, carbon monoxide, ozone, particulate matter, aldehydes, 1,3 butadiene, benzenes, and extremely persistent polycyclic aromatic hydrocarbons -- chemicals which are probable or known human carcinogens -- into the environment. These pollutants contribute to the denigration of water and air quality in National Parks by expelling substantial quantities of unburned fuel into the snowpack while emitting toxins into the air. Not only is human health, including the health of Park officials and snowmobilers compromised by exposure to such poisons, but these chemicals can adversely impact the fish, amphibians, mammals, birds, and vegetation in National Parks through acid rain, or when flushed into the aquatic system upon snowmelt.

According to snowmobile emissions data, in one hour a single snowmobile produces more smog-forming pollution than a modern car creates in one year. Every weekend in Yellowstone, snowmobiles at Old Faithful alone create more than a year's worth of park-wide automobile pollution. In the course of a year, the 60,110 snowmobiles entering Yellowstone in winter expel 13,860,920 pounds of hydrocarbons, compared to only 203,293 pounds for the 961,409 automobiles that annually use Yellowstone. Consequently, a single snowmobile season in Yellowstone contributes as much pollution to the environment as more than a half-century of automobile use. Amazingly, in 1996, carbon monoxide pollution data from West Yellowstone, Montana -- the west entrance to Yellowstone -- was the highest concentration recorded for CO nationwide, including cities with notoriously high CO levels such as Los Angeles and Denver.

Other impacts include adverse affects on vegetation and soils as a result of both legal and illegal use, disturbance to non-motorized Park users, and public safety issues.

As a result of these and other impacts inherent to snowmobile recreation, several National Parks, including Glacier and Lassen Volcanic have prohibited snowmobile use.

This rulemaking petition is intended to compel the Park Service to amend its regulations to prohibit all snowmobiling in the all National Park units. The limited exceptions to this requested ban include,

subsistence snowmobile use by indigenous people in Alaska, administrative and law enforcement activities of Park personnel, access to private inholdings, and essential services (i.e. search and rescue) at Park facilities. With considerable and credible evidence, the petition comprehensively documents the wide-ranging impacts caused by snowmobiling in National Parks. It also provides a thorough analysis of the relevant statutes, regulations, policies, and case law which supports and mandates a prohibition of recreational snowmobiling in National Parks. Ultimately, the prohibition on recreational snowmobile use in National Parks, if accepted and implemented by the Park Service, will result in substantial benefits to Park wildlife, ecology, air and water quality, and will restore the sanctity and serenity of the National Park experience.

CONCLUSION

In a 1997 speech at Grand Canyon, Secretary Babbitt squarely recognized that "degraded visitor experience is a now familiar reality in many of our National Parks." "A Transportation Renaissance in our Greatest National Parks," Nov. 25, 1997. Although he was specifically addressing cars, all the adverse impacts he described apply with the same, if not more, force to snowmobile use in the parks.

Our National Parks were not created in order to serve as national playgrounds, available for any and all uses. They were created to preserve "nature as it exists," H. Rep. No. 700, 64th Cong., 1st Sess. 3 (1916), affording the American people and people worldwide an unparalleled opportunity to see, hear and experience these national treasures in as natural a state as possible. There are more than enough areas, both on and off federal land, where snowmobilers can continue to use vehicles which pollute the air, disturb the flora and fauna, and disrupt peaceful contemplation of the serenity of nature in an undisturbed state. But our unique and irreplaceable National Parks should not be among those areas. Therefore, we respectfully request that the Park Service promptly issue for public comment a proposed rule prohibiting recreational snowmobiling and trail grooming in the National Parks. At minimum, we request that the Service publish notice of, and seek public comment on, this rulemaking petition within ninety days.

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